

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

LACIE EDON,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No. 1:24-cv-02195-TWP-KMB
)	
PNC BANK, in its own capacity and as)	
Successor to NATIONAL CITY BANK,)	
)	
Defendant.)	

MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiff, Lacie Edon (“Edon”), by counsel, for her Motion for Leave to Amend Complaint, states as follows:

1. Edon filed her Complaint in Hancock County Superior Court on November 14, 2024.
2. Defendant PNC Bank in its own capacity and as successor to National City Bank (“PNC”) filed its Notice of Removal on December 12, 2024.
3. Edon’s Complaint has not previously been amended.
4. Counsel for PNC recently notified Plaintiff of an inadvertent factual misstatement regarding Edon’s age in the Complaint, and PNC requested that the Complaint be amended.
5. The Amended Complaint only corrects the misstatement (paragraph 21 of the original Complaint) and changes the jurisdictional allegations to reflect the removal to Federal court. The proposed Amended Complaint is attached as Exhibit A.
6. The requested amendment does not interfere with any scheduled hearings, trials or deadlines set by the court.

WHEREFORE, Plaintiff requests leave to file her Amended Complaint and for all other appropriate relief .

Respectfully submitted,

Attorney for Lacie Edon

/s/ Lewis S. Wooton

Lewis S. Wooton, #26650-49

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317-318-1685

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2025, a copy of the foregoing was served on all counsel of record by using the Court's IEFS System:

/s/ Lewis S. Wooton

LEWIS S. WOOTON

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